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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CARRIE HARADA, an individual,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, a foreign
corporation; DOES I through X,
inclusive; and ROE BUSINESS
ENTITIES I through X, inclusive,

Defendants.

Case Number
2:24-cv-00559-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(Second Request)

STIPULATION AND ORDER [PROPOSED] TO EXTEND DISCOVERY

Plaintiff Carrie Harada, by and through counsel Corrine P. Murphy, Esq. and Kathleen H. Gallagher, Esq. and, and Defendant State Farm Mutual Automobile Insurance Company by and through counsel, Matthew Wagner, Esq. hereby agree and stipulate to extend the discovery and case management deadlines for an additional ninety (90) days.

1 **I. BACKGROUND**

2 On or about March 4, 2020, Plaintiff was involved in a motor vehicle collision
3 in Las Vegas, Nevada (hereinafter referred to as the “Subject Incident”). As a result
4 of the Subject Incident, Plaintiff sustained severe bodily injuries. On or about
5 October 5, 2021, Geico tendered its \$50,000.00 policy limit on behalf of at-fault
6 driver. Plaintiff had a policy of liability insurance through State Farm Insurance
7 Company, which provided liability limits of \$100,000.00 per person and \$300,000.00
8 per occurrence. Plaintiff is seeking damages due to Breach of Contract, Breach of
9 the Implied Covenant of Good Faith and Fair Dealing, and Violation of Nevada Unfair
10 Trade Practices Act NRS 686A.310, NAC 686A, et seq. as a result of Defendant’s
11 handling of Plaintiff’s claim.

12 **II. INFORMATION REQUIRED BY LOCAL RULE 26-4**

13 The parties provide the following information in accordance with Local Rule
14 26-4.

15 **A. Discovery Completed**

16 On June 12, 2024, Plaintiff served her initial disclosures.

17 On July 9, 2024 Defendant served their initial disclosures.

18 On July 23, 2024, plaintiffs served her first set of requests for admissions on
19 Defendant.

20 On July 23rd, 2024, Plaintiff served her first set of Requests for Production of
21 Documents on Defendant.

22 On July 23, 2024, Plaintiff served her first set of Interrogatories on Defendant.
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1 On September 16, 2024 Defendant served their responses to Plaintiff's first
2 set of Requests for Admission.

3 On September 16, 2024, Defendant served their responses to Plaintiff's first
4 set of Requests for Production of Documents.

5 On September 16, 2024, Defendant served their responses to Plaintiff's first
6 set of Interrogatories.

7 On December 5, 2024, the parties entered into a Stipulation and Order
8 regarding a confidentiality agreement, enabling Defendant to serve certain
9 documents, which this Court adopted as an Order.

10 On December 19, 2024, Defendant served their First Supplemental FRCP
11 disclosure.

12 **B. Discovery That Remains to Be Completed**

13 The parties also intend to serve additional written discovery, designate
14 experts, take depositions of key witnesses, and engage in motion practice if
15 necessary.

16 **C. Reasons Why the Deadlines Were Not Satisfied**

17 The parties have been working cooperatively in an effort to resolve this matter
18 without the need for accruing unnecessary litigation costs. Counsel for the parties
19 are meaningfully discussing settlement. In order to keep costs lower, the parties wish
20 to fully exhaust settlement discussions before commencing depositions and expert
21 designations. Also, both Plaintiff and Defendant counsel were out of the office
22 recently for illness and that caused a delay in the settlement discussions.

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1 **D. Proposed Schedule for Remaining Deadlines**

2 After conferring as to the needs of the case, the parties propose the following
3 schedule for discovery and the remaining case management deadlines, to include
4 an additional ninety (90) days beginning March 4, 2025.

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Deadline	Prior Date	New Date
Amend Pleadings and Add Parties deadline	February 3, 2025	CLOSED
Expert disclosure deadline	March 4, 2025	June 2, 2025
Rebuttal expert deadline	April 3, 2025	July 2, 2025
Close of discovery	May 2, 2025	August 1, 2025
Dispositive motion deadline	June 3, 2025	September 1, 2025
Joint Pre-Trial Order	July 3, 2025	October 1, 2025

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1 The parties state their proposed discovery extension request is made in good
2 faith and not sought for delay or any improper purpose, and that the additional time
3 is needed to allow the parties to complete discovery and adequately prepare the
4 case for trial or other resolution.

5 GALLAGHER LAW

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10 /s/ Matt Wagner
11 Ryan L. Dennett, Esq.
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12 Matt Wagner
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13 3301 N. Buffalo Drive, Suite 195
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14 *Attorney for Defendant*

15 **IT IS SO ORDERED.**

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17 UNITED STATES MAGISTRATE JUDGE

18 Dated: February 7, 2025
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